

Serial No. 10/089,777
Docket No. KEL 0124 PA

Amendment to the Claims

1. (Canceled)
2. (Currently Amended) An apparatus according to Claim 18, wherein the apparatus is arranged to reopen the gap by disengaging the movable tray from the gap and the guiding means is arranged to guide the tray out of the gap away from the activity surface.
3. (Currently Amended) An apparatus according to Claim 18, wherein the apparatus is arranged to close or reopen the gap relatively quickly such that the condition of the activity surface can be changed relatively quickly.
4. (Currently Amended) An apparatus according to Claim 18, wherein both the activity surface and the upper surface of the movable tray comprise turfed surfaces.
5. (Original) An apparatus according to Claim 4, wherein the turf of both the activity surface and the movable tray is provided on a layer of topsoil having a minimum depth of 150 mm, such that when tray is wedged in the gap, a continuous layer of topsoil is formed having a minimum depth of 150 mm.
6. (Currently Amended) An apparatus according to Claim 18, wherein the upper surface of the movable tray is arranged to have substantially the same coefficient of deformation as that of the activity surface such that when the tray is wedged in the gap, the resultant continuous activity surface has a substantially uniform coefficient of deformation.
7. (Currently Amended) An apparatus according to Claim 18, wherein the movable tray comprises a plurality of movable trays for closing the gap with at least one of the trays being arranged to exert a wedging action in the gap.
8. (Currently Amended) An apparatus for closing a fixed gap in an activity surface, the apparatus comprising a movable tray having an upper surface with the same characteristics as the activity surface and means for guiding the tray into the gap so as to wedge the tray releasably in the gap and thereby to provide a substantially continuous activity surface ~~An apparatus according to Claim 1,~~ wherein the guiding means is arranged to exert a substantially horizontal wedging action at edges of the activity surface at the gap and the edges of the tray.

Serial No. 10/089,777
Docket No. KEL 0124 PA

9. (Currently Amended) An apparatus for closing a fixed gap in an activity surface, the apparatus comprising a movable tray having an upper surface with the same characteristics as the activity surface and means for guiding the tray into the gap so as to wedge the tray releasably in the gap and thereby to provide a substantially continuous activity surface ~~An apparatus according to Claim 1, wherein the guiding means is arranged to exert a substantially vertical wedging action at edges of the activity surface at the gap and the edges of the tray.~~

10. (Currently Amended) An apparatus for closing a fixed gap in an activity surface, the apparatus comprising a movable tray having an upper surface with the same characteristics as the activity surface and means for guiding the tray into the gap so as to wedge the tray releasably in the gap and thereby to provide a substantially continuous activity surface ~~An apparatus according to Claim 1, wherein the movable tray comprises a base and upstanding side walls, the side walls comprising substantially vertical portions and upper portions provided at an angle to the vertical.~~

11. (Original) An apparatus according to Claim 10, wherein the upper portions are arranged at an acute angle to the vertical.

12. (Original) An apparatus according to Claim 11, wherein the upper portions are arranged at an angle of around 22 degrees to the vertical.

13. (Previously Presented) An apparatus according to Claim 10, wherein the tray comprises a liquid drainage grid provided at the base of the tray.

14. (Previously Presented) An apparatus according to Claim 10, wherein the tray comprises a coarse drainage material.

15. (Previously Presented) An apparatus according to Claim 10, wherein the tray comprises a top soil filling extending beyond the height of the upper portions of the side walls.

16. (Previously Presented) An apparatus according to Claim 10, wherein the tray further comprises an edging material and a soil filling, the edging material and soil filling being arranged to provide a tray edge which extends beyond the upper portion of the side walls at the same angle to the vertical as the upper portion of the side wall.

Serial No. 10/089,777
Docket No. KEL 0124 PA

17. (Original) An apparatus according to Claim 16, wherein the edging material extends along the upper portion of the side wall and continues along the same direction as the upper portion for a predetermined distance before being folded back into the soil to anchor the edging material.

18. (Previously Presented) An apparatus according to Claim 16, wherein the edging material comprises a porous geotextile or porous plastics sheeting.

19. (Currently Amended) An apparatus for closing a fixed gap in an activity surface, the apparatus comprising a movable tray having an upper surface with the same characteristics as the activity surface and means for guiding the tray into the gap so as to wedge the tray releasably in the gap and thereby to provide a substantially continuous activity surface~~An apparatus according to Claim 1,~~ wherein the edge profiles of the activity surface at the gap and of the movable tray comprise complimentary wedge shapes as viewed in a vertical plane.

20. (Currently Amended) An apparatus for closing a fixed gap in an activity surface, the apparatus comprising a movable tray having an upper surface with the same characteristics as the activity surface and means for guiding the tray into the gap so as to wedge the tray releasably in the gap and thereby to provide a substantially continuous activity surface~~An apparatus according to Claim 1,~~ wherein the edge profiles of the activity surface at the gap and of the movable tray comprise complementary wedge shapes as viewed in a horizontal plane.

21. (Currently Amended) An apparatus for closing a fixed gap in an activity surface, the apparatus comprising a movable tray having an upper surface with the same characteristics as the activity surface and means for guiding the tray into the gap so as to wedge the tray releasably in the gap and thereby to provide a substantially continuous activity surface~~An apparatus according to Claim 1,~~ wherein the edge profiles of the activity surface at the gap and of the movable tray comprise complementary curved edges as viewed in a horizontal plane.

22. (Currently Amended) An apparatus for closing a fixed gap in an activity surface, the apparatus comprising a movable tray having an upper surface with the same characteristics as the activity surface and means for guiding the tray into the gap so as to wedge the tray releasably in the gap and thereby to provide a substantially continuous activity surface and~~An apparatus according to Claim 1,~~ further comprising a support platform for the movable tray, wherein the

Serial No. 10/089,777
Docket No. KEL 0124 PA

support platform houses a movement system for moving the support platform and tray into the gap.

23. (Original) An apparatus according to Claim 22, wherein the support platform comprises a plurality of diagonal support members arranged in groups, each group being arranged to focus the weight of a region of the tray to a single location.

24. (Canceled)

25. (Original) An apparatus according to Claim 24, wherein the movement system comprises a set of wheels and the apparatus further comprises a set of guide rails for guiding the tray into the gap.

26. (Original) An apparatus according to Claim 25, wherein the guide rails are curved.

27. (Previously Presented) An apparatus according to Claim 25, wherein the movement system comprises means for raising and lowering the platform and tray.

28. (Previously Presented) An apparatus according to Claim 27, wherein the raising and lowering means comprise a set of hydraulic actuators acting on respective over-centre pivot arms, each over-centre pivot arm being connected to a wheel of the set of wheels.

29. (Previously Presented) An apparatus according to Claim 27, wherein the raising and lowering means has a independent override means including a back-up pump for enabling the raising and lowering to be effected independently.

30. (Previously Presented) An apparatus according to Claim 27, wherein the support platform comprises a plurality of support legs for supporting the weight of the tray and platform when the platform is in a lowered condition and from which weight can be transferred to the wheels via the over-centre pivot arms on actuation of the hydraulic actuators to place the platform into a raised condition.

31. (Original) An apparatus according to Claim 30, wherein each support leg is provided with a 'C' shaped pad for securely engaging the guide rail.

Serial No. 10/089,777
Docket No. KEL 0124 PA

32. (Previously Presented) An apparatus according to Claim 24, wherein the movement system comprises electric drive motors, the motors being pulse controlled such that the rate of movement and positioning of the platform can be varied and controlled accurately.

33. (Original) An apparatus according to Claim 32, wherein the movement system further comprises a digital controller for controlling the movement of the platform and tray via the electric drive motors.

34. (Original) An apparatus according to Claim 33, further comprising proximity markers provided at predetermined distances from ends of travel of the movable platform and tray and the movement system further comprising a proximity marker sensor for detecting the presence of the markers in order to slow down or speed up the movement.

35. (Previously Presented) An apparatus according to Claim 33, wherein the raising and lowering means comprises limit switch means for disabling lateral movement of the tray until the tray has been fully raised.

36. (Currently Amended) An apparatus for closing a fixed gap in an activity surface, the apparatus comprising a movable tray having an upper surface with the same characteristics as the activity surface, means for guiding the tray into the gap so as to wedge the tray releasably in the gap and thereby to provide a substantially continuous activity surface.~~An apparatus according to Claim 1, further comprising and an alignment system for aligning the edges of the tray with the edges of the activity surface at the gap at one end of the movable tray's travel.~~

37. (Original) An apparatus according to Claim 36, wherein the alignment system comprises alignment wedges provided at fixed locations with respect to the edges of the activity surface at the gap and guide means interactive with the alignment wedges for locating the platform and tray in a predetermined alignment with the edges of the activity surface at the gap.

38. (Original) An apparatus according to Claim 37, wherein the guide means comprise at least one wheeled housing which in use acts to move the platform and tray laterally until the platform is aligned correctly.

Serial No. 10/089,777
Docket No. KEL 0124 PA

39. (Original) An apparatus according to Claim 38, wherein the guide means comprises a plurality of wheeled housings, the wheeled housings being positioned at opposed ends of the platform for aligning each end in use.

40. (Previously Presented) An apparatus according to Claim 25, wherein the width of each of wheel is oversized with respect to the width of the each rail so as to allow relative lateral movement of the platform and tray.

41. (Previously Presented) An apparatus according to Claim 24, wherein the movement system comprises hover means disposed at an underside of the platform for creating a fluid cushion and raising the platform off the ground such that it can be moved laterally.

42. (Original) An apparatus according to Claim 41, the movement system further comprises at least one runway for providing a smooth flat surface for movement of the fluid cushion created by the hover means.

43. (Currently Amended) An apparatus for closing a fixed gap in an activity surface, the apparatus comprising a movable tray having an upper surface with the same characteristics as the activity surface, means for guiding the tray into the gap so as to wedge the tray releasably in the gap and thereby to provide a substantially continuous activity surface~~An apparatus according to Claim 1, further comprising and~~ winch means connectable to the tray or platform for effecting movement of the same.

44. (Currently Amended) An apparatus for closing a fixed gap in an activity surface, the apparatus comprising a movable tray having an upper surface with the same characteristics as the activity surface and means for guiding the tray into the gap so as to wedge the tray releasably in the gap and thereby to provide a substantially continuous activity surface~~An apparatus according to Claim 1,~~ wherein the guiding means is arranged to move the tray such that edges of the tray move into engagement with edges of the activity surface at the gap at an angle to the plane in which at least the upper portions of the edges of the activity surface at the gap are provided.

45. (Currently Amended) An apparatus for closing a fixed gap in an activity surface, the apparatus comprising a movable tray having an upper surface with the same characteristics as the

Serial No. 10/089,777
Docket No. KEL 0124 PA

activity surface and means for guiding the tray into the gap so as to wedge the tray releasably in the gap and thereby to provide a substantially continuous activity surface.~~An apparatus according to Claim 1,~~ wherein the edges of the activity surface at the gap are provided with a reinforcing wall structure for maintaining the uniformity of the edges of the activity surface and wherein each edge of the activity surface at the gap further comprises an edging material and a soil filling, the edging material and soil filling being arranged to provide an activity surface edge which extends beyond the upper portion of the reinforcing wall structure side walls and wherein the edging material extends along the upper portion of the reinforcing wall structure and continues along the same direction as the upper portion for a predetermined distance before being folded back into the soil to anchor the edging material.

46. (Canceled)

47. (Canceled)

48. (Currently Amended) An apparatus according to Claim 4645, wherein the edging material comprises a porous geotextile or porous plastics sheeting.

49. (Currently Amended) An apparatus according to Claim ~~18~~45, wherein the activity surface comprises a pathway.

50.-76. (Canceled)

77. (Original) A reconfigurable activity surface comprising a plurality of sections, a first one of the sections being provided in a movable tray that can be moved into engagement with a second one of the sections to form at least a portion of the activity surface, the first section comprising an overlapping edge which is inclined to the vertical and complimentary with a corresponding edge of the second section, such that the first section can be joined to be apparently seamless with the second section.

78. (Original) A reconfigurable activity surface according to Claim 77, wherein only upper portions of the edge of the first section and the second section are inclined to the vertical.

79. (Canceled).

Serial No. 10/089,777
Docket No. KEL 0124 PA

80. (Previously Presented) A reconfigurable activity surface according to Claim 78, wherein said activity surface comprises an activity pitch provided in a stadium.

81. (Previously Presented) A reconfigurable activity surface according to Claim 80, wherein the pitch is turfed.

82. (Original) A reconfigurable tray moving apparatus for constructing part of a reconfigurable activity surface, the apparatus comprising a set of guide rails and at least one tray providing part of the activity surface, which is movable on the rails, the apparatus further comprising means for moving the at least one tray laterally with respect to the direction of travel of the tray on the rails in order to effect alignment of the tray with an edge of the activity surface.

83. (Original) An apparatus according to Claim 82, wherein the lateral moving means comprises a set of wheels, each set having wheels oversized in width in relation to the width of the rails, thereby allowing relative lateral movement between the wheel and the rail.

84. (Previously Presented) An apparatus according to Claim 82, wherein the lateral moving means comprises a secured alignment means positionable at a predetermined position with respect to the edge of the activity surface and guide means providable on the movable tray to cooperate with the alignment means to align the movable tray with the edge of the activity surface prior to secure engagement therewith.

85. (Original) An apparatus according to Claim 84, wherein the secured alignment means is provided at two locations corresponding to the respective positions of the ends of the tray along the direction of travel at engagement with the edge of the activity surface.

86. (Previously Presented) An apparatus according to Claim 84, wherein the guide means comprises adjustment means for adjusting the relative position of the guide means to the tray.

87. (Previously Presented) An apparatus according to Claim 84, the alignment means comprises an elongate wedge and the guide means comprises a wheeled assembly for engaging the elongate wedge to effect said lateral alignment.

Serial No. 10/089,777
Docket No. KEL 0124 PA

88. (Original) A reconfigurable movable tray apparatus comprising a plurality of movable trays each providing a part of an activity surface and a set of guide rails wherein the trays are provided with engaging wheels which enable the trays to be movable on the guide rails to a desired coupling position and be securely located at the coupling position by transferring the weight of the tray from the guide wheels to fixed support means of the tray.

89. (Original) An apparatus according to Claim 88, wherein the apparatus is arranged to transfer the weight from the fixed support means of the movable tray to the guide wheels at the secure coupling position prior to moving the tray on the guide rails via the wheels to another position away from the coupling position.

90. (Previously Presented) An apparatus according to Claim 88, wherein each tray comprises a plurality of over-centre pivot arms each connected at one end to a guide wheel and having a hydraulic actuator provided at the other end, the over-centre pivot arms being arranged to be movable between two positions in order to effect the transfer of the weight.

91. (Original) An apparatus according to Claim 90, wherein each of the hydraulic actuators is controlled by a hydraulic power means which circulates hydraulic fluid to each actuator.

92. (Original) An apparatus according to Claim 91, wherein a flow divider means is provided for dividing the hydraulic fluid evenly between the hydraulic actuators to effect simultaneous and even actuation of the hydraulic actuators.

93. (Canceled)

94. (Currently Amended) A section according to Claim ~~93~~98, wherein the activity surface comprises a pathway.

95. (Currently Amended) A section according to Claim ~~93~~98, wherein the activity surface is a part of a turfed playing field.

96. (Original) A section according to Claim 95, wherein the activity surface is provided in a stadium.

Serial No. 10/089,777
Docket No. KEL 0124 PA

97. (Currently Amended) A section according to Claim ~~93~~98, wherein the activity surface has regions which wear at different rates and the replaceable section is provided in a region of excessive wear.

98. (Currently Amended) A replaceable section of an activity surface, the section being provided on a movable reconfigurable tray and being arranged to disengage the activity surface and be moved away therefrom to be replaced by another section of the activity surface provided on the movable tray~~A section according to Claim 93~~, wherein the movable tray is arranged to engage its edges with corresponding edges of the activity surface at an angle to the plane in which at least the upper portions of the edges of the activity surface are provided.

99. (Currently Amended) A replaceable section of an activity surface, the section being provided on a movable reconfigurable tray and being arranged to disengage the activity surface and be moved away therefrom to be replaced by another section of the activity surface provided on the movable tray~~A section according to Claim 93~~, wherein the movable tray is circular in shape and the section is moved away from the activity surface by being rotated about the centre of the tray.

100. (Previously Presented) A section according to Claim ~~93~~98, wherein the tray is movable on rails.

101. (Previously Presented) A section according to Claim ~~93~~98, wherein said activity surface comprises a racetrack.

102. (Previously Presented) A section according to Claim ~~93~~98, wherein said activity surface comprises a sports activity pitch.

103. (Canceled).

104. (New) An apparatus according to Claim 9, wherein the apparatus is arranged to reopen the gap by disengaging the movable tray from the gap and the guiding means is arranged to guide the tray out of the gap away from the activity surface.

Serial No. 10/089,777
Docket No. KEL 0124 PA

105. (New) An apparatus according to Claim 9, wherein the apparatus is arranged to close or reopen the gap relatively quickly such that the condition of the activity surface can be changed relatively quickly.

106. (New) An apparatus according to Claim 9, wherein both the activity surface and the upper surface of the movable tray comprise turfed surfaces.

107. (New) An apparatus according to Claim 106, wherein the turf of both the activity surface and the movable tray is provided on a layer of topsoil having a minimum depth of 150 mm, such that when tray is wedged in the gap, a continuous layer of topsoil is formed having a minimum depth of 150 mm.

108. (New) An apparatus according to Claim 9, wherein the upper surface of the movable tray is arranged to have substantially the same coefficient of deformation as that of the activity surface such that when the tray is wedged in the gap, the resultant continuous activity surface has a substantially uniform coefficient of deformation.

109. (New) An apparatus according to Claim 9, wherein the movable tray comprises a plurality of movable trays for closing the gap with at least one of the trays being arranged to exert a wedging action in the gap.

110. (New) A section according to Claim 99, wherein the activity surface comprises a pathway.

111. (New) A section according to Claim 99, wherein the activity surface is a part of a turfed playing field.

112. (New) A section according to Claim 111, wherein the activity surface is provided in a stadium.

113. (New) A section according to Claim 99, wherein the activity surface has regions which wear at different rates and the replaceable section is provided in a region of excessive wear.

114. (New) A section according to Claim 99, wherein the tray is movable on rails.

Serial No. 10/089,777
Docket No. KEL 0124 PA

115. (New) A section according to Claim 99, wherein said activity surface comprises a racetrack.

116. (New) A section according to Claim 99, wherein said activity surface comprises a sports activity pitch.